

# Exhibit A

**EXHIBIT A****SCHEDULE OF GOOGLE 30(b)(1) DEPONENTS**

<b>NO.</b>	<b>DEPONENT</b>	<b>STATUS</b>	<b>LOCATION</b>
1	██████████	Completed on August 17, 2023	Connecticut
2	██████████	Completed on November 3, 2023	New York
3	██████████	Completed on November 10, 2023	Washington DC
4	██████████	Completed on November 15, 2023	Washington DC
5	██████████	On March 14, 2024, Google informed Plaintiffs that Mr. ██████████ is a former employee not represented by Google's counsel. Google provided Plaintiffs with contact information for Mr. ██████████'s separate counsel.	Plaintiffs to schedule
6	██████████	Completed on April 1, 2024	Silicon Valley
7	██████████	Completed on April 3, 2024	Remote
8	██████████	On April 3, 2024, Google informed Plaintiffs that Mr. ██████████ is a former employee not represented by Google's counsel. Google provided Plaintiffs with his last known address and information on separate counsel that recently represented Mr. ██████████.	Plaintiffs to schedule
9	██████████	Completed on April 5, 2024	New York
10	██████████	On April 8, 2024, Google informed Plaintiffs that Mr. ██████████ is a former employee not represented by Google's counsel. Google provided Plaintiffs with last known address and contact information for Mr. ██████████'s separate counsel.	Plaintiffs to schedule
11	██████████	Completed on April 17, 2024	Remote
12	██████████	Completed on April 19, 2024	Remote

NO.	DEPONENT	STATUS	LOCATION
13	██████████ (notice issued April 17)	Completed on April 26, 2024	Remote
14	██████████	Completed on April 26, 2024	Remote
15	██████████	Completed on April 29, 2024	New York
16	██████████	Scheduled for April 30, 2024	Remote
17	██████████ (notice issued April 17)	Scheduled for May 1, 2024 but Plaintiffs withdrew on April 28, 2024	N/A (withdrawn)
18	██████████	Scheduled for May 1, 2024	New York
19	██████████	Scheduled for May 2, 2024	Remote
20	██████████ (notice issued on April 17, 2024)	Offered for May 2, 2024. Google made this offer on April 25 but Plaintiffs have yet to accept it.	Offered in Los Angeles or remote. Plaintiffs to confirm.
21	██████████ (notice issued on April 17, 2024)	Offered for May 3, 2024. Google made this offer on April 29.	Offered in New York. Plaintiffs to confirm.
22	██████████ (notice issued on April 17, 2024)	Plaintiffs noticed for May 3, 2024 and Google offered that date. Google made this offer on April 26 but Plaintiffs have yet to accept it.	Offered in Atlanta or remote. Plaintiffs to confirm.
23	██████████ (notice issued on April 17, 2024)	Plaintiffs noticed for May 3, 2024 and Google has offered that date. Google made this offer on April 26 but Plaintiffs have yet to accept.	Offered in New York or remote. Plaintiffs to confirm.
24	██████████ (notice issued on April 17, 2024)	On April 22, 2024 Google informed Plaintiffs that Ms. ██████████ is a former employee not represented by Google's counsel. On April 26, Google provided Plaintiffs with Ms. ██████████'s last known address.	Plaintiffs to schedule.
25	Neal Mohan	On April 24, Google informed Plaintiffs that if Mr. Mohan is	Offered in Silicon Valley

NO.	DEPONENT	STATUS	LOCATION
		required to sit for a 30(b)(1) deposition, he is available on May 3. Plaintiffs' motion ignore this and incorrectly states that Google has not offered a deposition date for Mr. Mohan.	
26	<div data-bbox="310 520 500 604" style="background-color: black; width: 117px; height: 40px; margin-bottom: 5px;"></div> (noticed issued on April 17, 2024)	Ms. <div data-bbox="683 520 824 562" style="background-color: black; width: 87px; height: 20px;"></div> is a former employee now employed at Amazon. Google is in the process of determining whether it will represent Ms. <div data-bbox="813 674 954 716" style="background-color: black; width: 87px; height: 20px;"></div> in connection with the deposition notice issued by Plaintiffs on April 17.	Google to confirm
27	<div data-bbox="310 846 516 888" style="background-color: black; width: 127px; height: 20px; margin-bottom: 5px;"></div> (notice issued on April 17, 2024)	Mr. <div data-bbox="683 846 808 888" style="background-color: black; width: 77px; height: 20px;"></div> 's Rule 30(b)(1) Notice was issued after his Rule 30(b)(6) and MDL deposition had been negotiated for late April. While Google disagrees that Mr. <div data-bbox="971 993 1079 1035" style="background-color: black; width: 67px; height: 20px;"></div> should be required to sit for an additional deposition in this matter given the number of times he has already been deposed (including being deposed as a 30(b)(6) witness in this litigation), if his deposition occurs, it will need to occur after May 3.	Google to confirm
28	Sergey Brin	Google is today filing its Objection to the Special Master's Report and Recommendation in connection with this deposition. Google notified Plaintiffs on April 9 that Mr. Brin was not available for a deposition before May 3.	Google to confirm
29	Sundar Pichai	Google is today filing its Objection to the Special Master's Report and Recommendation in connection with this deposition. Google notified Plaintiffs on April 9 that Mr. Brin was not available for a deposition before May 3.	Google to confirm